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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

STEVEN EARL CARR, an individual,

Plaintiff,

v.

UNITED STATES OF AMERICA; DAVID
N. KARPEL, individually, DOES 1 through
100; and ROES 1 through 100; inclusive,

Defendants.

Case No.: 2:20-cv-01850-GMN-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR PLAINTIFF
TO RESPOND TO MOTION TO DISMISS
FILED BY DEFENDANTS UNITED STATES
OF AMERICA AND DAVID N. KARPEL
[ECF No. 26] AND FOR DEFENDANTS TO
FILE THEIR REPLY FOR ONE
ADDITIONAL DAY**

(Third Request)

NOW COMES the Plaintiff, STEVEN EARL CARR, by and through his attorneys, Melanie A. Hill and Melanie Hill Law PLLC, and Defendants UNITED STATES OF AMERICA and DAVID N. KARPEL, by and through their attorneys, Assistant United States Attorney Gregory Addington, who hereby stipulate that Plaintiffs may have an extension of time from the current deadline of August 17, 2021 until August 18, 2021, within which to respond to the Defendants' Motions to Dismiss [ECF No. 26]. The parties further stipulate that Defendants shall have an extension of time from the current deadline of September 22, 2021 until September 23, 2021 to file their reply in support of the Motion to Dismiss [ECF No. 26]. This Stipulation is made at the request of Plaintiff's

1 counsel for the reasons set forth herein and this is the third request for an extension of the deadlines to
2 respond and reply to the pending Motion to Dismiss [ECF No. 26].

3 In support of this Stipulation and Order, the parties state as follows:

4 1. The second amended complaint was filed in this case on July 2, 2021 [ECF No. 25] after
5 the Court entered an Order granting Plaintiff's Motion for Leave to File Proposed Second Amended
6 Complaint and denying Defendants' Motion to Dismiss as moot on July 2, 2021 [ECF No. 24].

7 2. Defendants filed their Motion to Dismiss Plaintiff's Second Amended Complaint on July
8 2, 2021 [ECF No. 26].

9 3. Counsel for all parties previously stipulated to an extension of the response deadline given
10 that Plaintiff's counsel is recovering from injuries from two separate accidents. As a result, counsel
11 for plaintiff is dealing with back and neck pain that make it difficult for her to work for long periods
12 of time writing. The additional time will allow her to complete the response and accommodate her
13 pain and the limited time she can work each day and also accommodate her for one additional day
14 due to her unavailability today due to travel. Plaintiff has also agreed to extend the Defendants' reply
15 deadline one additional day.
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17 4. This stipulation and order are being brought in good faith and is not sought for any
18 improper purpose or other purpose of delay, but to allow counsel for the parties' additional time to
19 respond and reply to the motion to dismiss and brief the necessary issues raised in the motion to
20 dismiss due to the reasons articulated herein.
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1 WHEREFORE, the parties respectfully request that the Court extend the deadline for Plaintiff
2 to respond to Defendants' Motion to Dismiss [ECF No. 26] from the current deadline of August 17,
3 2021 until August 18, 2021. The parties further respectfully request that the Court extend the
4 deadline for Defendants to file their reply from the current deadline of September 22, 2021 until
5 September 23, 2021.
6

7 DATED this 17th day of August, 2021.

8 Respectfully submitted,

9 MELANIE HILL LAW PLLC

10 */s/ Melanie A. Hill*
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Respectfully submitted,

CHRISTOPHER CHIOU
Acting United States Attorney

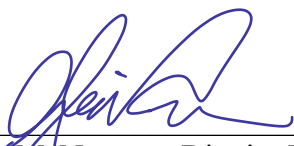
10 */s/ Gregory Addington*
11

12

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18 *Attorney for Defendants United States of*
19 *America, David L. Jaffe, and David N. Karpel*

20 **IT IS SO ORDERED.**

21 Dated this 18 day of August, 2021.

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Gloria M. Navarro, District Judge
24 UNITED STATES DISTRICT COURT
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